

***United States Court of Appeals
for the Second Circuit***



**APPELLANT'S
SUPPLEMENTAL
APPENDIX**

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UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

-----x
UNITED STATES OF AMERICA,

Appellee

77-8076

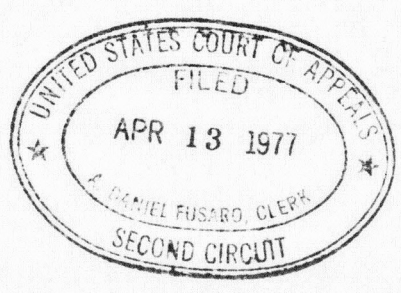
-against-

JOSEPH SAMPSON,

Defendant-Appellant.

DEFENDANT SAMPSON'S SUPPLEMENTAL APPENDIX

On Appeal from a Judgment From the United States
District Court for the Southern District of New York



Frederick H. Cohn
Attorney for Appellant Sampson
299 Broadway
New York, New York 10007
212 249-7755

PAGINATION AS IN ORIGINAL COPY

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

-----X
UNITED STATES OF AMERICA,

Appellee

-against-

JOSEPH SAMPSON,

Defendant-Appellant.
-----X

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: 77-8076

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: ERATA SHEET TO SUPPLEMENTAL
: APPENDIX OF JOSEPH SAMPSON

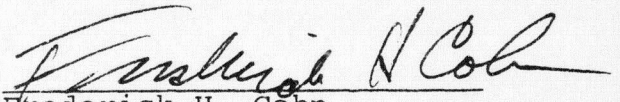
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Margin notations contained on SA-1 should be
omitted and are not part of the document
marked 3505W for Identification.

Respectfully submitted,


Frederick H. Cohn
Attorney for Appellant Sampson

INDEX TO SUPPLEMENTAL APPENDIX

	<u>Page</u>
3505W for Identification (letter of Jack Brown)	SA-1
Psychiatric Evaluation of 3505W by Dr. Harvey Roy Greenberg	SA-3
Search Warrant and Return of 1974	SA-6
Search Warrant and Return of 1976	SA-13

This is true and factual, no fiction
Persons named are also real and
true, full names or and nick names
(street names) My name John T. Brown
alias Jack Brown, Perry Dupree,
Ken Wiseman, Todd Monroe.

3505
Wid.

Since on the run, I've dealt in
Cocaine real real big, but now I'm
a marked man to be hit by

Black Mafia, murder ring Chicago
N.Y. Wash, D.C. 3 or 5 or more
members of white and Cuban outfits
My connection was and is one
Tony Alvarez 2680 - N.W. 123rd St.
Miami Fla - Phone 305-688-0658

then you
have a
person
address,
city, state
phone #

[Biggest in U.S.A. [Black Mafia
Leader Yvonne Chapman, Chicago
Ill. Phone - 312 - 221-0626,] also
professional supplier for filter &
weapon & (laser light seeing through
apt houses or steel or heavy concrete
putting victim on television lead to

if asking for, D.C.

Investigation

Director of David Brown

Important

right target using a stove or
burner in street language to
burn victim, leaving no traces

The Boss and enforcer
Mr. "B." Sebastian Intersimone
Rt 1 Box A - Accord N. Y. State
PH-914-626-7780 Vicious

Phone - 301-350-

Michel (Mikie) Parker 1745
Addison Rd. South, District Hg
Md. (Son in law) to my daughter
Jacqueline Brown Parker, Mikie
xx Cross me out of fear.

You can get taps on phone, and
get pertinent info. If I can
continue to dodge my killer
I will. but only to I get O.K.

If you don't hear from me
I'm dead J.T.B. 7/23/75

RAH 7/23/75 RAL 7/23/75

RM 7-23-75

J.T.B.

7/23/75

RAH 7/23/75

Harvey Roy Greenberg, M. D.

320 WEST 86TH STREET
NEW YORK, N. Y. 10024

TELEPHONE: (212) 595-5220

13 September 1976

The enclosed letter, written by John T. Brown, has been forwarded to me by Frederick Cohn, Esq. to ascertain if any psychological inferences can be drawn regarding the writer's mental condition.

The letter is some two hundred words long, and begins with an affirmation of the author's veracity, immediately followed by his identification and a formidable list of aliases. It gives every indication of being written under considerable emotional pressure. The style is clipped, terse, condensed, and - at times - distinctly telegraphic. There are occasional omissions of verbs ("My name John. T. Brown..."), punctuation marks ("...full name's or and nicks (street names) My name John T. Brown...") and capitalizations ("!..xx cross me out of fear. you can get taps on phone"). There are also several abbreviations ("apt" for "apartment", "xx cross" for "double cross"). Altogether, the letter with these syntactical modalities conveys an ineluctable sense of the writer looking over his shoulder in fleeing pursuit, pausing for the briefest time and space in which to communicate his extreme danger - as in a suspense film wherein the hero has only a moment to commit his desperate need for rescue to a scrap of paper that may - just possibly may - be retrieved by a passerby.

Within the context of the writer's obviously overwhelming fear and perception of imminent attack, the syntax and logic of the letter seems, for the most part, to be fairly good until the writer names the methods of his threatened detection and punishment:

"(laser light seeing through apt houses or steel or heavy concrete putting victim on television dead to right target using a stove or burner in street language to burn victim, leaving no traces..."

Touching upon these horrific means of his destruction escalates the writer's anxiety level, resulting in one long jumbled free association, beginning with a single parenthesis, becoming progressively more illogical and idiosyncratic, then trailing off without enclosure. Herein, I believe, the writer reveals delusional tendencies and paranoid trends, including delusions of observation ("laser light seeing through apt houses...putting victim on television...") and deadly persecution ("using a stove or burner... to burn victim, leaving no traces..."). In this sentence the writer's language also shifts between the allusive and the concrete. He invokes the street slang "burn" - to kill, then states that some sort of actual "stove" or "burner" can be used to eliminate the "victim" totally. This shifting modality of thinking - allusive to concrete - is not infrequently encountered in psychotic processes.

In writing his letter, the author reveals a central preoccupation with his elimination by members of a powerful, malignant agency referred to as "Black Mafia", stemming from his admittedly "real real big" cocaine dealing. Cameron points out that it is not uncommon for the paranoid patient suffering from "an amorphous, undefined mass of suspicions" based on a tortured inner reality replete with repressed hostility and fear to embody and crystallize out his anxiety in a "paranoid pseudocommunity" of powerful persecutors to explain his pregnant sense of dis-ease. "The pseudo-community may, for example, be the Communists, the Mafia (sic), or the FBI, and the patient

Harvey Roy Greenberg, M. D.

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is terrified of being killed, taken advantage of, or arrested and confined..." Intriguingly, the writer turns for relief from his persecutors to the director of another group (it would appear equally powerful in his fantasies) of observers and detectors, the FBI.

Linn has classically defined a delusion as a false belief..."not one ordinarily shared by other members of the patient's sociocultural and educational group: for example it is not a commonly believed superstition or a religious or political conviction..."² Although a certain level of realistic suspicion is endemic amongst drug dealers, I would submit that belief in pursuit and detection by "laser light se—eing through apt houses or steel or heavy concrete" exceeds the bounds of realistic thinking even within this cultural subgroup. In pure culture a delusional tendency "arises without appropriate external stimulation..." However in many instances there is an elaboration of a delusional structure from actual life situations; Freud believed, in this regard, that every delusion harbored a kernel of reality.

It is quite possible that a plausible kernel of reality within the writer's framework of laser beams and burner—s may well be that the writer, a self admitted cocaine dealer, moving in the dangerous drug underworld wherein actual doubledealing and betrayal is endemic, actually did incur displeasure and has projected his appropriate apprehensions in a delusional fashion. It is not impossible that he himself has been less than honest with confederates and ponders the status of his own "criminality" within that society. In this regard, it is of note that his persecutors with their lasers and television bring the "victim" "dead to right", a turn of phrase usually applied to the conviction of a felon.

It would be impertinent on the basis of this limited evidence to make any further conclusions beyond the fact that the letter suggests paranoid and delusional trends in its author. The extent and cause of these trends, in my opinion, calls out for clarification in view of the very serious allegations this man has made, to determine his ability to assess reality and how seriously his judgement was and/or is influenced by irrational thinking processes. It would, for instance, be necessary to ascertain the role of cocaine use in his productions, if such usage has existed on his part. Heavy administration of cocaine may predispose a vulnerable personality to the development of a paranoid psychosis indistinguishable from paranoid schizophrenia.³

A final thought - and a highly speculative one. Although conceivably of limited formal education, this man is not illiterate. He uses words like "pertinent", "language" and "laser" without misspelling. There is only one spelling error in the letter (although several punctuation errata) and it occurs twice: "victim". Psychoanalytically, one might be suspicious that this error actually represents a condensation of "victim" and "rectum", occurring as it does in a statement filled with references to penetration and destruction. Therefore, one would wonder about the writer's possible unconscious fears and fantasies about anal rape, a not uncommon locus of anxiety in male paranoids.

Harvey Roy Greenberg, M. D.

320 WEST 86TH STREET
NEW YORK, N. Y. 10024

TELEPHONE: (212) 595-5220

Specific references:

1. Cameron, N. A.; The Paranoid Pseudo-community; American Journal of Sociology; 49; 32, 1943.
2. Linn, L., Clinical Manifestations of Psychiatric Disorders, in Comprehensive Textbook of Psychiatry - II; Vol. I, Williams and Wilkins, Baltimore; pp. 792-3, 1975.
3. Grinspoon, L., Drug Dependence: Non-Narcotic Agents, *ibid*, Vol. 2, 1326-7.

General reference:

1. Freud, S., Psycho-analytical notes upon an autobiographical account of a case of paranoia (dementia paranoides), 1911, in Collected Papers of Sigmund Freud, Vol. 3, J. Strachey, ed., Basic Books, NY, 1959.
2. S. Freud, Certain Neurotic mechanisms in jealousy, paranoia, and homosexuality, *ibid*, Vol. 2.

Harvey
Harvey R. Greenberg, M.D.,
Associate Clinical Professor in Child Psychiatry,
Albert Einstein Medical College,
The Bronx, New York.

AFFIDAVIT FOR SEARCH WARRANT

DEPARTMENT
IN THE DISTRICT COURT AT SHADY GROVE

STATE OF MARYLAND, MONTGOMERY COUNTY, TO WIT:

People's Court Docket # _____

STATE OF MARYLAND

VS

The premises known as Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, a high rise apartment with a balcony believed to be occupied by Raymond Darryl Sampson.

BEFORE
District Court Judge _____
Montgomery County, Maryland

District Court Judge

The undersigned being duly sworn deposes and says:

that he has reason to believe that (~~XXXXXX~~)
(on the premises known as) The premises known as
(~~XXXXXX~~)

Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, a high rise apartment with a balcony believed to be occupied by Raymond Darryl Sampson.

in the State of Maryland, County of Montgomery,

there is now concealed certain property, namely controlled dangerous substance, to wit: Marijuana LSD & controlled paraphernalia, adulterants or equipment (here describe property) commonly used in the manufacture and distribution of controlled dangerous substances, such as, but not limited to any of the following: scales, sieves, strainers, measuring spoons, staples, staplers and packaging equipment. Monies derived from the sale or delivery of controlled dangerous substance books, lists, records, or papers pertaining to the trafficking, delivery or possession of controlled dangerous substances.

which are (in violation of) Article 27, Sections 286 (a)(1), 286 (a)(5), and 290 of the Annotated Code of Maryland (1971 Edition) (here give alleged grounds for search and seizure) and are being held illegally and are fruits of a crime as defined in Article 27, Sections 286 (a)(1), 286 (a)(5) and 290.

and that the facts tending to establish the foregoing grounds for issue of a search warrant

are as follows: SEE AFFIDAVIT ATTACHED HERETO AND MADE A PART HEREOF

[Signature]
Signature of Affiant

[Signature]
Official Title (if any)

Sworn to before me, and subscribed in my presence this 24th day of July, 1974.

District Court Judge

[Signature]
District Court Judge
Montgomery County, Maryland

DB Form #73

SEARCH WARRANT

DISTRICT
IN THE DISTRICT COURT AT GLEADY GROVE

STATE OF MARYLAND, MONTGOMERY COUNTY, TO WIT:

People's Court Docket #

STATE OF MARYLAND

vs.

The premises known as Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, a high rise apartment with a balcony believed to be occupied by Raymond Darryl Sampson.

SEARCH WARRANT

TO Col. K. W. Watkins, Superintendent of the Department of Police, Montgomery County, Maryland, or any other person authorized to serve same.

Affidavit having been made before me by Pvt. Ronald A. Ricucci

that he has reason to believe that ()
(on the premises known as)
()

The premises known as Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, a high rise apartment with a balcony believed to be occupied by Raymond Darryl Sampson.

in the State of Maryland, County of Montgomery,

there is now being concealed certain property, namely controlled dangerous substance, to wit Marijuana, controlled paraphernalia, adulterants, or (here describe property) equipment commonly used in the manufacture and distribution of controlled dangerous substances, such but not limited to any of the following: scales, sieves, strainers, measuring spoons, staplers and packaging equipment. Monies derived from the sale or delivery of controlled substances, books, lists, records, or papers pertaining to the trafficking, delivery or pos of controlled dangerous substances.

which are (in violation of) Article 27, Sections 286 (a)(1), 286 (a)(5) and 290 of the Anno Code of Maryland (1971 Edition) (here give alleged grounds for search and seizure) and are being held illegally.

and as I am satisfied that there is probable cause to believe that the property so described being concealed on/in the () above described and that the foregoing grounds for (premises) () application for issuance of the search warrant exist,

You are hereby commanded with the necessary and proper assistants to search forthwith () named for the property specified, serving this warrant and making the search () (place) (at any time in the day) and if the property be found there to seize it, and prepare a written inventory of the property seized and return this warrant and bring the property before me, the subscriber, within five days of this date, as required by law.

Dated this 24th day of July, 1974.

District Court Judge

[Signature]
District Court Judge in and for
Montgomery County, Maryland

AN AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT TO BE ISSUED BY A MONTGOMERY COUNTY DISTRICT COURT JUDGE IN AND FOR MONTGOMERY COUNTY, MARYLAND, FOR THE PREMISES KNOWN AS APARTMENT 1211 OF 11235 OAKLEAF DRIVE, SILVER SPRING, MONTGOMERY COUNTY, MARYLAND, A HIGH RISE APARTMENT WITH A BALCONY BELIEVED TO BE OCCUPIED BY RAYMOND DARRYL SAMPSON.

Comes now your affiant, Pvt. Ronald A. Ricucci, Department of Police, Montgomery County, Maryland, assigned to the Vice-Intelligence Division, making an affidavit in support of a District Court Search Warrant for Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland.

1. In June of 1974, your affiant received information from a confidential reliable informant that Raymond Darryl Sampson of Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, was dealing L.S.D. and Marihuana from his apartment at the above location.
2. Your affiant, as a result of checking official Vice-Intelligence files, learned that on November 13, 1973, Uniform Officers Wright, Stanton, Magee and Hancock responded to 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, for a possible Marihuana party at Apartment 1211 of the above location.
3. On November 13, 1973, the Uniform Officers Wright, Stanton, Magee and Hancock detected a strong odor of Marihuana outside of Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland. The Officers after knocking at the door, were unable to obtain any response. They then obtained a pass key and gained entry.
4. Pvt. Arthur Stanton was a member of the Vice-Intelligence Division for six months during which he was trained in the recognition of the odor of Marihuana.
5. The Uniform Officers, once inside the Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, detected a strong odor of Marihuana and found Raymond Darryl Sampson in a bedroom of the apartment.
6. The Uniform Officers found six (6) ounces of Marihuana directly underneath of the balcony of Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland. The Uniform Officers made no arrests.
7. The confidential informant has in the past supplied information which has proved reliable to the Montgomery County Department of Police.

MAY 13 1975
UNITED STATES ATTORNEY
EO. 12812

A. The confidential informant introduced your affiant to a subject which resulted in two (2) buys of a quantity of Hashish. There are warrants outstanding on the subject in question at this time. This occurred in June, 1974.

B. In June, 1974, the confidential informant introduced your affiant to a subject which resulted in your affiant making two (2) large purchases of Marijuana and one (1) arrest which is pending before Circuit Court in Montgomery County, Maryland.

C. The confidential informant provided your affiant with information which was turned over to the Takoma Park Police Department which resulted in six (6) arrests for Possession of Firearms. Takoma Park Police also seized two (2) sawed-off shotguns and two (2) pistols. These cases are pending in District Court in Montgomery County, Maryland.

D. In June, 1974, the confidential informant supplied your affiant with information as to the whereabouts of a subject wanted by the Vice-Intelligence Division of the Montgomery County, Maryland, Department of Police which resulted in an arrest.

E. In June, 1974, the confidential informant provided information which initiated an investigation which eventually resulted in a large seizure of Marijuana and six (6) arrests. These cases are pending before Circuit Court in Montgomery County, Maryland.

8. Between June 1, 1974, and July 1, 1974, the confidential informant stated to your affiant that Raymond Darryl Sampson of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, left his Apartment 1211 in the above building and met the confidential informant inside the apartment building for the purpose of purchasing a quantity of L.S.D. from Sampson.

9. The confidential informant met Raymond Darryl Sampson at 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, within the apartment building where the confidential informant purchased a quantity of suspected L.S.D. from Sampson with U. S. currency from the Montgomery County Narcotic Enforcement Fund.

10. Your affiant field tested the L.S.D. which proved positive. The L.S.D. was also analyzed by the Drug Enforcement Administration laboratory in Washington, D.C., by Chemist Sebastian Manganello whose findings proved positive for L.S.D.

11. Between June 15, 1974, and June 30, 1974, your affiant learned from the

confidential informant who had been inside the Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland, that Raymond Darryl Sampson was holding a large quantity of Marihuana within the apartment.

12. Between July 1, 1974, and July 23, 1974, the confidential informant related to Pfc. R. F. McKenna of the Vice-Intelligence Division, Narcotic Section, who is your affiant's partner, that there was a Marihuana plant growing on the balcony of Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland.

13. On July 23, 1974, Pfc. R. F. McKenna of the Narcotic Section of the Vice-Intelligence Division, observed a Marihuana plant growing on the balcony of Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland. Pfc. R. F. McKenna observed the plant growing from a window on the twelfth floor of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland.

14. Pfc. R. F. McKenna who has been assigned to the Vice-Intelligence Division for a year has observed over one thousand (1,000) Marihuana plants in various growing stages.

15. On July 23, 1974, your affiant was contacted by the confidential informant who related there was a small quantity of suspected L.S.D. and Marihuana inside Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland.

Based on the above, it is the belief of your affiant, that there is reasonable grounds to believe that violations of Article 27, Sections 286 (a)(1), 286 (a)(5) and 290 of the Annotated Code of Maryland (1971 Edition) are being committed at Apartment 1211 of 11235 Oakleaf Drive, Silver Spring, Montgomery County, Maryland. Your affiant further believes, based upon the above and the expertise of your affiant, that controlled dangerous substances are being held illegally in the aforementioned location and a search warrant be issued for the premises by the District Court in and for Montgomery County, Maryland.

P. R. McKenna
Pfc. Ronald A. Ricucci

Subscribed and sworn to before me this 24th day of July, 1974.
Dated this 24th day of July, 1974.

W. H. S. Smith
JUDGE OF THE DISTRICT COURT IN AND FOR
MONTGOMERY COUNTY, MARYLAND

REPORT AND RETURN

I received the attached search warrant on the 26th day of July 1971
and have executed it as follows:

On the 25th day of July, 1971, at 10:20 o'clock A.M.

I searched the (XXXXXXX) described in the warrant.
(premises)
(XXXXIXLXX)

The following is an inventory of property taken pursuant to the warrant:

1. Marihuana plant from the balcony.
2. One ounce of Marihuana from top drawer of nightstand beside door in Raphael Sampson's bed
3. Three pills from top drawer of chester drawers beside window in Raphael Sampson's bedroom
4. Smoking bong with Marihuana residue from top of chester drawers in Raphael Sampson's bedr
5. Smoking pipe from top of chester drawer in Raphael Sampson's bedroom.
6. Envelopes containing Marihuana residue, film cannister with PCP, paper with record of fir
three one ounce bags of Marihuana, sifter with Marihuana residue, smoking pipe, kitchen s
and measuring spoon with Marihuana residue and tweezers from nightstand beside Raphael San
bed.
7. Bottle of Lactose with traces, white paper bag containing measuring spoons, three paper
envelopes with white powder, two prescription bottles with white powder, two playing card
one scotch tape, two bars of soap, one strainer, a brown paper bag containing three strain
plastic baggies with white substance, tin foil with white powder from cabinet under sink
Ray Sampson's bedroom.
8. Cardboard box containing numerous plastic bags used for packaging of Heroin from stool ou
Ray Sampson's bedroom.
9. Brown paper bag containing two plastic baggies containing one pound of white powder.
10. Six prescription bottles containing pills and personal papers from a clutch bag on the to
of the chester drawers in Ray Sampson's bedroom.
11. Bottle containing number three caps with forty-six capsules containing suspected Heroin f
night stand beside door in Ray Sampson's bedroom.
12. Envelopes containing Marihuana stems from night stand beside bed in Ray Sampson's bedroom
13. Personal papers of Ray and Lois Sampson from within the apartment.
14. Darvocet capsules from main chester drawer.
15. Measuring spoon from top shelf of closet in Ray Sampson's bedroom.
16. Six pills in black jewelry case from top of the chester drawers in Ray Sampson's bedroom.
17. Set of vending machine keys from top of chester drawers in Ray Sampson's bedroom.
18. One .45 caliber gun, serial # 52984; one Walther pistol, serial # 213050P; one R610 pistol
serial # 172180; and one Beck pistol, serial # 158683; from bedroom of Ray Sampson.
19. One desecrated American flag from Raphael Sampson's bedroom.
20. Firecrackers from dining room.

This inventory was made in the presence of Off. Alan E. Eagles

and

I swear that this inventory is a true and detailed account of all the property taken by me on
the warrant.

Subscribed and sworn to and returned before me this _____ day of _____, 1971

Alan E. Eagles
DISTRICT COURT JUDGE ~~XXXXXXXXXXXXXXXXXXXX~~ in and
for
Montgomery County, Maryland

Official Title (if any)

Montgomery County, Maryland

P.G. FORM 127
JUNE 1972

PRINCE GEORGE'S COUNTY MARYLAND
POLICE DEPARTMENT

PROPERTY RELEASE

PROPERTY OFFICE USE ONLY
1. Property File No.

2. CCN

76-097-223

3. Type of Case (Check One) ☒ Evidence

4. Reason for Release (Check One)

☐ Recovered ☐ Safekeeping

☒ Ct. Presentation ☐ Released to Owner

5. Item No's Released

B - ASSORTED PERSONAL PAPERS

6. Released by Name, Rank, ID# (Signature) Unit Assigned

7. Released to: Name (Signature) Address:

8. Released From: (Location)

9. Time and Date Released

4-23-76 AT 1400 hrs.

10. Item No's

Retained by: Court ☐ State's Attorney's Office ☐

11. Location Retained:

DEA - WASH D.C.

12. Name of Court Clerk or State's Attorney

JOHN W. ATLEE, S/A, DEA

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
IN THE DISTRICT COURT OF MARYLAND, DISTRICT 5

APPLICATION FOR SEARCH WARRANT

By Corporal R.F. Gheen, #620, Vice-Intelligence Section, Prince George's County Police Department. (Name, rank, department or agency)

The Affiant hereby makes application to Sylvester C. Woods,

a Judge of the Circuit Court for Prince George's County, Maryland/District Court of Maryland, District 5,
for a search warrant on the grounds that there is probable cause, the basis of which is set forth in the
following Affidavit which is attached hereto and made a part hereof, to believe that there is property
subject to seizure under the laws of this State and more particularly in violation of _____

Article 27, Section 287 (a) _____ Annotated Code of Maryland, situated or located
at 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County,
Maryland. That this said address is further described as being the residence of Joseph
Raphael Sampson and Lois Theresa Sampson, among others.

(Describe premises/person/motor vehicle in detail - Attach photograph if available and include any outbuildings you wish to search)

In support of said Application For Search Warrant Affiant being duly sworn deposes and says:

(Affiant should recite the underlying circumstances and facts within his personal knowledge and explain in as much detail as possible all reasons why he is applying for a search warrant as well as why he has reason to believe the property to be on the person / premises / motor vehicle as described. Use additional sheets if necessary.)

That your affiant is a detective assigned to the Narcotics Section of the Prince George's County Police Department, Vice-Intelligence Section. That I have been employed by the said Prince George's County Police Department for a period of over six years. That during that time I was assigned, temporarily, to the Narcotics Section of the Prince George's County Police Department, Vice Control Section for a period of five months as an undercover narcotics investigator during which time I received specialized training in matters pertaining to the violations of the Controlled Dangerous Substance Laws of the State of Maryland. That at this time I am assigned to the said Vice-Intelligence Section as a narcotics investigator to investigate violations of the Maryland Controlled Dangerous Substance Act. That your affiant has received training in General Law Enforcement and in Narcotics Law Enforcement from the Prince George's County Police Academy. That your affiant has received specialized training from a two week school sponsored by the United States Department of Justice, Drug Enforcement Administration. That your affiant has made numerous investigations of violations of the Controlled Dangerous Substance Act and that these investigations have resulted in the arrest and conviction of persons involved in violating the Controlled Dangerous Substance Act.

Wherefore your Affiant hereby makes application and prays that a Search Warrant be issued authorizing him, with the necessary and proper assistants, to search the said premises located at 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County, Maryland. That this said address is further described as being the residence of Joseph Raphael Sampson and Lois Theresa Sampson, among others.

Prince George's County, Maryland.
(Describe premises/person/motor vehicle in detail - Attach photograph if available and include any outbuildings you wish to search.)

for the property specified, to wit: Marihuana, Any and all Controlled Dangerous Substances, in whatever form, condition, or however packaged, and to seize such paraphernalia that is used in the administration, preparation, or in conjunction with the said illegal activities, and to open all receptacles and to seize such of its contents which pertain to the said illegal operation.

(Make detailed list of property for which you wish to search)
and if the property be found there to seize it and to seize any property found liable to seizure under the laws of this State. I do solemnly declare and affirm under the penalties of perjury that the contents of the foregoing document are true and correct.

Cpl. R.F. Gheen
(Signature of Affiant)
Corporal R.F. Gheen, #620
Corporal, Vice-Intelligence Section, Prince George's
County Police (Rank, department or agency) Department.

Subscribed and sworn to before me this 21st day of April

1976

John W. Zerbe
Judge

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
IN THE DISTRICT COURT OF MARYLAND, DISTRICT 5

SEARCH WARRANT

To Corporal R.F. Gheen, #620, Vice-Intelligence Section, Prince George's County Police Department.
(Name, rank, department or agency.)

Whereas it appears to me, the subscriber, Sylvester W. Woods

_____, a Judge of the Circuit Court
for Prince George's County, Maryland / District Court of Maryland, District 5, by the written Affidavit of
the applicant herein, Corporal R.F. Gheen, #620, Vice-Intelligence Section, Prince George's County Police Department.
a copy of which is attached hereto and made a part hereof, that there is probable cause, the basis of which
is set forth in said Affidavit, to believe that certain property subject to seizure under the laws of this State
and more particularly in violation of Article 27, Section 267 (a)

Annotated Code of Maryland, situated or located at 1028 University Boulevard, Apartment #923
Silver Spring, Prince George's County, Maryland. That this said address is further described
as being the residence of Joseph Raphael Sampson and Lois Theresa Sampson, among others.

_____, Prince George's County, Maryland.
(Describe premises/person/motor vehicle in detail—Attach photograph if available and include any outbuildings you wish to search.)

You are therefore hereby commanded, with the necessary and proper assistants, to search

forthwith the said Premises (1028 University Boulevard, #923, Silver Spring, Prince George's County, Maryland.
Marihuana, (premises, person, motor vehicle)

for the property specified, to wit: Any and all Controlled Dangerous Substances, in whatever
condition, or however packaged, and to seize such paraphernalia that is used in the
administration, preparation, or in conjunction with the said illegal activities, and to
open all receptacles and to seize such of it's contents which pertain to the said illegal
operation.

(Make detailed list of property for which you wish to search.)

and if the property be found there to seize it and to seize any property found liable to seizure under the
laws of this State leaving a copy of this Warrant and a written inventory of the property taken, and return
this Warrant to me, the subscriber, or in my absence to any other Judge of this Circuit Court / District
Court within five days from the date of the execution of this Warrant together with a copy of the written
inventory of the property taken, as required by law.

Hereof fail not at your peril and have you then and there this Warrant.

Given under my hand this 21st day of April, 1979

Sylvester W. Woods
Judge

That on April 21, 1976 at 7:45 A.M., your affiant accompanied Federal Narcotic Agents from the Department of Justice, Drug Enforcement Administration to the aforementioned address of 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County, Maryland for the purpose of executing Federal Bench Warrants which were issued by a Federal Court in the Southern District of New York for the arrest of one, Joseph Raphael Sampson and one, Lois Theresa Sampson, of 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County, Maryland, under Federal Warrant #76-CR-0324. That the Federal Bench Warrants were issued for Conspiracy to Sell Heroin.

That your affiant and the Federal Agents were admitted into the said address of 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County, Maryland by the said Lois Theresa Sampson. That at this time, the said Lois Theresa Sampson, who was positively identified by Agent Jack Atlee of the Drug Enforcement Administration, was placed under arrest by Agent Atlee for the aforementioned Federal Bench Warrant, and Agent Atlee also advised the said Lois Theresa Sampson of her Constitutional Rights under the Miranda Decision.

That at this time, your affiant and the Federal Agents went into the two bedroom areas in search of the second suspect, Joseph Raphael Sampson. That your affiant, while searching for the suspect in the rear bedroom, observed in plain view a Marihuana smoking pipe with suspected Marihuana, and Marihuana residue contained inside the bowl of the pipe, lying on a nightstand in an ashtray to the right of the bed. That your affiant seized the said Marihuana pipe. That the said Joseph Raphael Sampson was not found in the said apartment.

That at this time, your affiant advised the said Lois Theresa Sampson that your affiant was going to obtain a search and seizure warrant for the said premises.

That the Federal Narcotics Agents were left at the said residence with the said Lois Theresa Sampson to secure the said premises until this writer returned with a Search and Seizure Warrant.

That your affiant then responded to the Prince George's County Police, Bureau of Criminal Investigations in Forestville, Maryland. That at this time, your affiant performed a preliminary field test on the suspected Marihuana, and the test showed a positive reaction for Marihuana.

PAGE THREE OF AN AFFIDAVIT BY CORPORAL P.F. CHAFFIN, ID 690, VICE-INTELLIGENCE SECTION, PRINCE GEORGE'S COUNTY POLICE DEPARTMENT.

Based on the merits of this affidavit, your affiant knows that a narcotic violation is currently existing at the said address of 1028 University Boulevard, Apartment #923, Silver Spring, Prince George's County, Maryland by the said Joseph Raphael Sampson, and the said Lois Theresa Sampson, among others.

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
IN THE DISTRICT COURT OF MARYLAND, DISTRICT 5

RETURN

I received the attached Search Warrant on APRIL 21

1976, and have executed it as follows:

On APRIL 21, 1976, at 1100 o'clock am/p.m.

I searched the premises / person / motor vehicle described in the Warrant, and I left a copy of the Warrant

with JOHN ROBERT SAMPSON (LAWYER - 200 S. S. S. N.E.)

(Person from whom property was taken or person in charge of premises.)

together with a copy of the inventory of the property taken.

The following is an inventory of property taken pursuant to the Warrant:

- A - \$620.00 U.S. CURRENCY
- B - TWO CLEAR PLASTIC BAGGIES CONTAINING SUSPECTED NARCOTIC TRACES
- C - ONE STRAIN SCARTER
- D - ONE SMALL BROWN ENVELOPE CONTAINING MARIJUANA
- E - TWO MARIJUANA SACKS & PIPE
- F - ONE PLASTIC BAG CONTAINING MARIJUANA
- G - NUMEROUS TIN FIL SQUARES
- H - NUMEROUS ASSORTED PERSONAL PAPERS
- I - ONE BROWN PAPER BAG WITH WHITE POWDER TRACES

This inventory was made in the presence of CPL D.K. BROWN #566

and CPL L.D. GARRETT #507

I swear that this inventory is a true and detailed account of all the property taken by me on the
Warrant.

CPL R. J. GILK #620
(Officer conducting search)

Subscribed and sworn to and returned before me this _____ day of

_____, 1976.

Judge

Mr. Clerk:

Please file pursuant to Maryland Rule 707.

Judge

COPY RECEIVED

APR 13 1977
ROBERT B. FISKE JR.
U.S. ATTORNEY
SO. DIST. OF N. Y.

